

# **EXHIBIT B**

**From:** [Andrew Brettler](#)  
**To:** [petersjoan](#); [Carlos Garcia Perez](#); [Gustavo D. Lage](#); [Angie Velando](#); [Rasika Reichardt](#)  
**Cc:** [Patricia M. Patino](#); [Jake Camara](#); [Joel Sichel](#); [Regina Peter](#); [Amanda Morris](#)  
**Subject:** Re: Depositions/discovery deadline  
**Date:** Wednesday, December 3, 2025 1:16:11 PM

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**SECURITY NOTE:** \*This email has originated from OUTSIDE of SMGQ Law. Please exercise caution with attachments and links \*

Dear counsel:

On November 5, 2025, the Court issued a show cause order to Plaintiff and stayed Mr. Bonnell's deposition pending resolution of his motion for a protective order. [Dkt. No. 167.]

Accordingly, we are not amenable to rescheduling Mr. Bonnell's deposition at this time, nor do we believe there is any legitimate reason to extend the court-ordered discovery deadline, or any of the other deadlines referenced in your email below.

Any delay in the prosecution of this case has been of Plaintiff and her counsel's own doing. Indeed, Plaintiff failed to show up for her own deposition; and Plaintiff's counsel, who also represent *four* of the witnesses to whom Mr. Bonnell issued subpoenas in this action, have actively obstructed Mr. Bonnell's discovery efforts by failing to respond to subpoenas and/or threatening not to appear for properly noticed depositions.

Sincerely,

**Andrew B. Brettler** | BERK BRETTLER LLP  
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On Dec 2, 2025, at 10:23 AM, petersjoan <petersjoan@bellsouth.net> wrote:

Counsel:

The discovery deadline is Dec 16th-- 2 weeks away. The Court has not yet ruled on Defendant's Motion for Protective Order, and dates have not been set for the deposition of either Plaintiff or Defendant. There are other pending matters as well, including but not limited to, the defendant's document production and Plaintiff's potential motion to compel, and the deposition of Melina Goransson. We propose filing a joint motion to extend the discovery deadline until Feb 16th, and setting the Plaintiff's and Defendant's depositions for any 2 days between Jan 12 and the 16th. We further propose that the dispositive motion deadline be moved from Jan 30 to March 16th, and the pretrial motions deadline be moved from March 30 to April 18. We might also consider rescheduling the mediation deadline and the Dec. 22nd mediation date. These extensions should not affect the trial date set by the Court. Please advise your position and let us know if you would like to discuss.

Regards,  
Joan